

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**AULISTAR MARK, HANCHEN LU and**  
**ANDREW HUDSON, Individually and on Behalf of**  
**All Others Similarly Situated,**

**Plaintiffs,**

**-against-**

**GAWKER MEDIA LLC, and NICK DENTON,**

**Defendants.**  
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**AFFIDAVIT OF TANISHA RAMIREZ**

TANISHA RAMIREZ declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am of legal age and am competent to make this Declaration. I have personal knowledge of the facts sets forth in this Declaration, or I have learned said facts.

2. I was an intern for Gawker Media, LLC's ("Gawker's") women's fashion, celebrity, and news-focused website Jezebel.com from August 2012 until April 2013.

3. I applied in response to a post on the Jezebel website for a general intern contributor. To apply, I sent in a cover letter describing my interests along with my resume. I was asked to come to the office to interview in June 2012 with several people including Jessica Cohen, Dodai Stewart, and Erin Gloria Ryan. They subsequently offered me an internship, and we agreed that I would start in August. The initial internship post did not specify a particular role for the intern, but since I expressed an interest in celebrity gossip we decided that I would primarily contribute to Jezebel's Midweek Wednesday Madness ("MWM") posts.

4. The Jezebel internship paid me \$100 per day. At the same time, I was also a full-time freelancer for different non-Gawker publications. I was not in school, so I did not require any academic credit.

5. My main supervisor was Dodai Stewart.

6. I interned in the New York office on Wednesdays from about 10am to 2pm. because that was when the MWM was published. Around September 2012, I found another part-time job, so I stopped

going into the Gawker office and contributed remotely. Later, when that part-time job was over, I came back to intern in the office with my regular Wednesday schedule.

7. Dodai trained me in how to do the tasks related to the MWM posts. This included walking me through how she crafted the posts in the past and what specific angle and voice was expected at Jezebel. She also showed me how to write in the Jezebel voice myself. Dodai would edit my writing and give me feedback. She was a very hands-on teacher, and she would carefully edit the piece and explain to me how to tweak the voice, if necessary. If she provided me with feedback and I made improvement the following week, she would tell me so. There was a lot of positive reinforcement.

8. From August 2012 until November 2012 and from February 2013 to April 2013, I contributed to the MWM. From November 2012 until February 2013, I worked on aggregating headlines. When I contributed to MWM, my day started by gathering many of the physical tabloids published on Wednesdays, reading them, summarizing them, and writing up a piece that commented on the information in the edgy, Jezebel style. When I was interning remotely, in the morning I would review three or four online publications instead of the physical tabloids. Whether I was in the office or remote, I would then send Dodai the piece I wrote describing the tabloid news for her to edit. She would line-edit my writing and then publish it. When I worked on headlines, I compiled links of trending stories.

9. The internship with Jezebel helped me improve my writing and editing skills. After the internship, I was able to read, summarize and deliver content a lot faster. I am now able to adopt different voices for different publications because I learned how to write in Jezebel's very unique voice. Also, I became more familiar with many of the online publications in this industry.

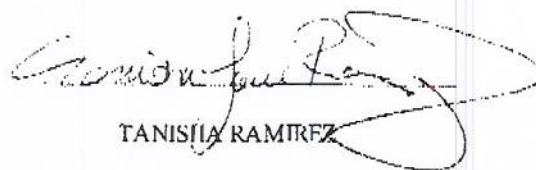
10. When my internship ended, I felt like I had gained a lot of valuable experience. After the internship, I freelanced for other publications including *The Huffington Post*, *Cosmo for Latina* magazine, askmen.com, and several independent online publications geared towards the Hispanic community. I am still freelancing today.

11. The internship at Jezebel appears on my current resume. I believe it helped me secure subsequent work in the field and was impressive to have on my resume. For example, during a job interview, the Editor-In-Chief of *Cosmo for Latina* magazine expressed that she was very impressed that I had interned for Jezebel.

12. Before I provided the information for this declaration, I was asked if I intended to join the current lawsuit (I do not). Before I provided the information for this statement, certain information was communicated clearly to me, including that my participation was completely voluntary. Then, I made a voluntary decision to provide the information for and to sign this statement.

I declare under the penalty of perjury under the laws of the State of New York and the United States of America that the foregoing is true and correct.

Executed this 10 day of January, 2014 in New York, NY.

  
TANISIA RAMIREZ